

MATTIE CONDRAY

Dear Ms. Condray:

I am writing to comment on proposed changes to 45 CFR 1611. Having struggled for more than 25 years to understand, streamline and explain this to staff and others, I support these changes that clarify and simplify the process of determining eligibility.

First, I believe that the change that allows a program to determine eligibility based on the receipt of benefits from a governmental program if benefits are less than 125% of poverty level is a sensible and time saving change.

Second, the clarifications of the requirements for documentation necessary for group representation are long overdue. Too often advocates have declined to represent such groups for fear of running afoul of the requirements of this rule. I believe that the changes will make it more comfortable--therefore easier--for advocates to work with the community on projects that can have a real impact on clients' problems.

Third, the elimination of the Retainer Agreement requirements in the regulation is much welcomed. This has been an administrative burden not related to either the needs of clients or the quality of representation in many instances.

Finally, I would urge the Corporation to reconsider the definition of income to exclude payroll and income taxes. It has never made sense that an applicant for service whose disposable income is regularly reduced by meeting these obligations cannot have that considered when unpaid taxes could be taken into consideration under 1611.5. That certainly does seem to reward the less responsible.

Mary Ellen Drolet, Deputy Director
Western Michigan Legal Services